

EXHIBIT E  
TO 2255  
MOTION  
GX802AUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA :

-v.- :

**STIPULATIONS**

ROSS ULBRICHT, :

S1 14 Cr. 68 (KBF)

a/k/a "Dread Pirate Roberts," :

a/k/a "DPR," :

a/k/a "Silk Road," :

Defendant. :

----- X

IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Preet Bharara, United States Attorney for the Southern District of New York, Serrin Turner and Timothy Howard, Assistant United States Attorneys, of counsel, and Ross Ulbricht, by and through his counsel, Joshua Dratel, Esq., as follows:

1. If called to testify, Shelby Richardson, a Special Agent with the Drug Enforcement Administration ("DEA"), would testify that:

a. From September 2011 to May 2018, Special Agent Richardson attempted a total of 8 undercover purchases from the Silk Road website using the Silk Road username "downers4u."

b. Government Exhibit 802 is a spreadsheet reflecting the results of the undercover purchases.

i. The column labeled "Purchase Date" indicates the date the order was placed on the website.

ii. The column labeled "Vendor" indicates the username of the vendor with whom the order was placed.

- iii. The column labeled “Drug Ordered” indicates the type of drug ordered.
  - iv. The column labeled “Delivery Date” indicates the date that the order was retrieved from the mailing address designated by Special Agent Richardson in placing the order.
  - c. All of the orders reflected in the spreadsheet were placed by Special Agent Richardson using a computer located in the Southern District of New York and were shipped to an undercover mailing address located in the Southern District of New York.
  - d. All of the substances received were submitted to the DEA Northeast Laboratory for testing.
2. If called to testify, Russell J. Gallis, a Forensic Chemist with the DEA, would testify that:
- a. On the dates indicated in the column of Government Exhibit 802 labeled “Lab Test Date,” Mr. Gallis tested each of the substances Special Agent Richardson transferred to the DEA Northeast Laboratory.
  - b. The column of the spreadsheet labeled “Net Weight” reflects the weight of each substance submitted for testing, after removal of any packaging.
  - c. The column of the spreadsheet labeled “Drug Detected” indicates any illegal drugs the substance was found to contain through testing a sample of the substance, using reliable laboratory procedures.
  - d. As reflected in the spreadsheet, all 8 substances submitted by Special Agent Richardson tested positive for illegal drugs.

IT IS FURTHER STIPULATED AND AGREED that Government Exhibit 802 and this Stipulation (Government Exhibit 802A) are admissible as Government exhibits at trial, except that the defendant reserves the right to object to these exhibits under Federal Rule of Evidence 403 or 404(b).

Dated: New York, New York  
December 8, 2014

PREET BHARARA  
United States Attorney  
Southern District of New York

By: 

SERRIN TURNER  
TIMOTHY T. HOWARD  
Assistant United States Attorneys

  
JOSHUA L. DRATEL  
Counsel for the Defendant